



Subscriber Group Small Group Discussions Table Topics Packet

1. Aggregation

a. Goals for this topic:

Subscribers provide insight and considerations on any documentation, tariff sheets, contracts, notification schedules that could streamline the administrative workload and standardize the verification process for aggregated projects.

b. Summary:

M-RETS is experiencing an increase in the number of aggregated distributed generators in the system; we expect more to come with MN SES, approximately 2,400 customer sited units in MN. At least 10% of the 1.5 % MNSES goal must be met by solar energy generated by or procured from solar photovoltaic devices with a nameplate capacity of 20 kw or less. Furthermore, Illinois has a DG solar requirement ramping up in 2014

c. Relevant Sections of Operating Procedure:

- i. 3.3.2 Distributed Generation Aggregation
- ii. 3.3.3 Verification of Static Data Submitted During Generator Registration
- iii. 3.4 Assignment of Rights of Registration – Designation of Responsible Party
- iv. 6.2 Misrepresentation of Static Information

d. Supporting Documentation:

- i. Attachment A-registration documentation matrix
- ii. Attachment B-proposed required fields for registering DG units

e. Issues and Areas for Input

- i. Schedule A Requirement
- ii. Metering Considerations ANSI Standards

2. Minnesota Solar Energy Standard (MN SES)

a. Goals for this topic:

Subscribers provide insight on additional flags or identifiers that would improve the M-RETS system for MN SES compliance.

Identify additional fields Subscribers would like to see in a particular report to help with MN SES compliance.

a. Summary:

At least ten percent of the 1.5 percent goal must be met by solar energy generated by or procured from solar photovoltaic devices with a nameplate capacity of 20 kilowatts or less. Illinois has a DG solar goal ramping up this year and Wisconsin has several DG units registered in M-RETS.

3. Data Requests-Process

a. Goals for this topic:

Provide guidance to staff on how to respond to data requests, particularly from government staff.

b. Summary:

Staff currently has access to public reports, the regulator view, and invoicing data.

We may get requests from NREL or state agencies dealing with solid waste. Sometimes these calls are directed to the System Administrator and staff by Commission staff.

Example: *“Do you have data for 2012 for MWh produced at power plants X & Z that exclusively used refuse derived fuel?”*

Can we direct the staff to the account holder to fulfill this data request?

Should staff draft a data request form that account holders and board can approve?

4. REC to RIN

a. Goals for this topic:

Subscribers determine if they need anything from M-RETS in reports or in the data base to participate in the RIN market.

b. Summary:

The EPA has proposed new pathways to Renewable Identification Number (RIN) creation. The pathway most relevant to our work at M-RETS seems to be electricity from Landfill Biogas as a Qualifying Cellulosic Biofuel. Based on its GHG accounting, EPA proposes that electricity generated from landfill gas feedstocks is a cellulosic biofuel, capable of generating RINs. While EPA implies that the electricity may need to be used to charge electric vehicles (EVs), the proposed rule is unclear about the level of verification required to demonstrate that the electricity is being used for a transportation purpose. Rules were expected this winter, but with the shutdown, it is unclear.

5. Import/Export

a. Goals for this topic:

Subscribers identify scenarios where they need to import and export RECs between REC tracking systems.

Example of data needed to review an import request:

1. *Summary of what you are trying to achieve.*
2. *Current M-RETS account holders impacted by this request. (Who is benefitting and how does this help M-RETS customers?)*
3. *Tracking Systems involved and the directional flow of the REC.*
4. *Fuel type.*
5. *Voluntary or Compliance?*
6. *Origin of the REC-Attributes/REC definition of RECS originally issued that are to be transferred.*
7. *Metering standards the issued RECs were subject to (example: were these customer sited solar PV RECs, and if so, what sort of meter standards applied to the original issuance)*

b. Summary:

Subscribers may currently export RECS to MIRECS, NCRETS and NARR. The board has a goal of adopting policies to determine the parameters for exports to all systems as well as allowable imports into MRETS. We have been working with other tracking systems to identify data and metering standards and required documentation and verification for imported and exported RECs. We are using sample requests to guide development of policies.

c. Sections of Operating Procedure that deal with Import/Export:

- i. 15 Imports and Exports of Certificates
- ii. 15.1 Import of Certificates
- iii. 15.2 Export of Certificates
- iv. 15.3 Re-Import of Exported Certificates
- v. 15.4 Preventing Double Counting of Imported/Exported Certificates

d. Supporting Documentation Attached:

- i. Attachment C- Import-Export pdf



6. Open Topic: _____

a. Goals for this topic:

b. Summary:

c. Sections of Operating Procedure:

7. Open Topic: _____

a. Goals for this topic:

b. Summary:

c. Sections of Operating Procedure:

Thank you for participating in the 2013 Subscriber Group Table Topics.
Feel free to share your ideas and suggestions with staff year round.

| | Fields required | Satisfies the following requirements: | Micro-Generator Project Account | Small Generator Project Account | Project Account | General Account | Aggregator Account (potential account type-not yet in M-RETS system) | Note |
|--|-----------------|---|---------------------------------|---------------------------------|-----------------|-----------------|--|--|
| Schedule A | | 1. Proof of right to registration | x | x | x | x | x | All Account Types are subject to the Schedule A. M-RETS may want to review IOU request to contract language as a substitute for the schedule A as long as the language 1) grants the utility the right to register the project and manage the RECs on behalf of the owner and 2) has the owner attest that the RECs between a set period of time were not used for compliance or voluntary purposes, and have not granted similar authority or permission to any other Subscriber or Account Holder for use in the M-RETS System or any similar system |
| EIA Form 860 | | 1. Proof of existence 2. Verification on Nameplate Capacity | | | x | x | x | EIA only applicable to large generation (over 25 MW) |
| Attestation | | 1. attesting that no other entity can claim the generation 2. attesting that generation is not tracked in another system | | | | | | The purpose you defined for the attestation is what the Schedule A does. I am not sure this is applicable unless for a varience request. |
| Interconnection Agreement | | 1. proof of existence 2. meter number | x | x | x | x | x | An Interconnection agreement is recommended for non utility registrations as proof of existance. |
| Utility bill | | 1. proof of existence 2. meter number | | | | | | After reviewing a Utility Bill, I don't find much value in asking for it. There is little information proving existance of an inter connected system. |
| Contracts/Signed Agreements containing: 1) grants the utility the right to register the project and manage the RECs on behalf of the owner and 2) has the owner attest that the RECs between a set period of time were not used for compliance or voluntary purposes, and have not granted similar authority or permission to any other Subscriber or Account Holder for use in the M-RETS System or any similar system | | 1. Proof of right to registration | | | | | | All Account Types are subject to the Schedule A. M-RETS may want to review IOU request to contract language as a substitute for the Schedule A as long as the language 1) grants the utility the right to register the project and manage the RECs on behalf of the owner and 2) has the owner attest that the RECs between a set period of time were not used for compliance or voluntary purposes, and have not granted similar authority or permission to any other Subscriber or Account Holder for use in the M-RETS System or any similar system |
| Secretary Certificate | | 1. proof of authority to register project | x | x | x | x | x | This is secondary to the Schedule A or contract to that satisfies the 2 Schedule A purposes outlined above. |
| Other Proof of Authority | | | x | x | x | x | x | This is secondary to the Schedule A or contract to that satisfies the 2 Schedule A purposes outlined above. |
| Rate Sheet-may have REC ownership terms? | | | | | | | | |
| Regulatory Order (from WREGIS OP) | | | | | | | | Registration based on regulitory or Court order has been requested before. No clear requirements from M-RETS have been defined. |

| Proposed Required Fields for Uploading Registration-Static Fields |
|--|
| (csv upload template fields) |
| GU Name |
| GU Owner |
| Nameplate Capacity |
| COD (Interconnection Date) |
| Address |
| City |
| State |
| Zip Code |
| Meter ID |
| Meter Manufacture |
| Meter Type |

PJM captures photographs and state issued certification numbers. Registering 800/month

M-RETS can capture GPS coordinates/google map images

Looking at Clean Power Research irradiance data tools and subscriptions used for production based incentives as an auditing/verification

M-RETS may assign unique DG number when generators are registered in aggregate under a single unique project number ex: (M317-)

